

May 10, 2004

Mr. Frank Roddy  
State Water Resources Control Board  
Division of Water Quality  
P.O. Box 100  
Sacramento, CA 95812-0100

Subject     Southern California Edison Company Comments  
              Regarding the California Ocean Plan

Dear Mr. Roddy:

Southern California Edison Company (SCE) has reviewed the proposed four amendments and seven administrative changes to the Ocean Plan. SCE requests that the State Water Resources Control Board (SWRCB) make one additional administrative clarification to the Ocean Plan.

Currently, Ocean Plan Section II.C.3 provides that “natural light shall not be significantly reduced at any point outside the initial dilution zone as the result of the discharge of waste.” Appendix 1 to the Ocean Plan states that a reduction of natural light may be determined by measuring light transmissivity or total irradiance, or both. A significant reduction is one that has a statistically significant difference in the means of two sampling results distributions at the 95% confidence level.

However, determining if a reduction in the amount of natural light has occurred is not a simple process, and the Ocean Plan should provide greater guidance on this matter. For instance, the Ocean Plan does not describe where in the water column the light transmissivity or total irradiance should be measured; at the surface, the bottom, or throughout the water column. Additionally, the Ocean Plan does not indicate what duration of time may be used to evaluate light transmissivity or total irradiance changes. For example, a reduction in natural light due to a momentary increase in turbidity will have no adverse affect on marine biota. In contrast, a continuous reduction in natural light for an extended period of time may cause a significant adverse impact. To resolve these questions, SCE recommends that the SWRCB clarify this issue by revising the definition of “natural light” to read:

**NATURAL LIGHT:** Reduction in natural light may be determined by the Regional Board by measurement of light transmissivity or total irradiance, or both, according to the monitoring needs of the Regional Board. Data averaging or integration of natural light measurements through the water column at and among specific monitoring location may be appropriate, depending on site-specific conditions. Appropriate data averaging periods may also be used in a compliance determination in order to consider seasonal differences or other biologically important time periods.

The above proposed amendment will help define reductions in natural light and ensure uniform compliance with this provision throughout the state's ocean waters. SCE appreciates the SWRCB's consideration of the above request.

Sincerely,

A handwritten signature in black ink, appearing to read "David W. Kay", written in a cursive style.

**DAVID W. KAY**  
Manager of Environmental Projects